B R E W E R
ATTORNEYS & COUNSELORS

March 31, 2020

VIA ECF

Hon. Christian F. Hummel
United States Magistrate Judge
United States District Court
James T. Foley U.S. Courthouse
445 Broadway, Room 441
Albany, New York 12207

   Re: *National Rifle Association of America v. Cuomo*, No. 18-cv-00566-TJM-CFH

Dear Judge Hummel:

   On behalf of Plaintiff, the National Rifle Association of America (the "NRA"), I write to renew the NRA's motion for the issuance of Letters of Request for International Judicial Assistance to compel the production of documents by, and the taking of depositions of, the Corporation of Lloyd's ("Lloyd's") and certain of its Managing Agents (the "Motion").[1] As this Court is aware, in its Order dated March 6, 2020,[2] this Court denied the NRA's Motion without prejudice to renewing it if Judge McAvoy granted the NRA's appeal of this Court's Order dated August 8, 2019, finding certain of the NRA's document requests to Defendants were not relevant. This afternoon, Judge McAvoy granted the NRA's appeal.[3] Thus, the NRA seeks to renew its Motion in accordance with this Court's direction.

   While Defendants are expected to argue that any documents produced pursuant to the Letters of Request need to be submitted for *in camera* review, the NRA submits that this step can be eliminated inasmuch as the *in camera* review process is designed to screen out privileged materials. Lloyd's and its Managing Agents do not have the ability to assert governmental privileges and can produce a privilege log regarding any non-governmental privileges they may assert in the normal course.

   Accordingly, the NRA asks that this Court grant its Motion, and issue Letters of Request for documents and deposition testimony as set forth in the NRA's Motion. The NRA is available for a telephonic conference regarding this request at the Court's earliest convenience. Thank you for your consideration of this matter.

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[1] ECF No. 129.

[2] ECF No. 181.

[3] ECF No. 188.

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Respectfully,

John Canoni

cc: All Counsel of Record (via ECF)